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LITIGATION BUREAU

December 13, 2021

By ECF

Honorable Miroslav Lovric
United States Magistrate Judge
United States District Court
Northern District of New York
15 Henry Street
Binghamton, New York 13901

Re: *Dr. A., et al., v. Hochul, et al.*, 21-CV-1009 (DNH)(ML)

Dear Judge Lovric:

In light of plaintiffs' currently pending application for a Writ of Injunction in the United States Supreme Court, as well as a similar injunction application in *We the Patriots USA, Inc. v. Hochul*, 17 F.4th 266 (2d Cir. 2021), the parties propose that the deadlines in this matter be adjourned as follows:

- Within forty-five (45) days of any decision by the Supreme Court on the pending *Dr. A* related *We the Patriots* injunction applications, defendants will answer or move to dismiss the Complaint.
- The parties' deadlines to exchange Rule 26 initial disclosures are adjourned without date pending the above response;
- The Rule 16 conference is adjourned without date pending the above response.

I have conferred with plaintiffs' counsel, Christopher Ferrara, Esq. who is agreeable to this proposal. Further, it would serve judicial economy to adjourn the deadlines in the Northern District as requested above. The Supreme Court's decision is likely to inform the parties' positions with respect to further litigation of this action in the Northern District.

Thank you for your consideration of this request.

Respectfully submitted,

s/ Ryan W. Hickey

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cc: All counsel of record (via ECF)